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May 1, 2023

By ECF

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: **United States v. Karl Sebastian Greenwood, S5 17 Cr. 630 (ER)**

Dear Judge Ramos:

I write to provide the Court with the bank records that I mentioned during the motion hearing on April 11, 2023. As the Court will recall, there was some discussion during that hearing about the administrability of calculating U.S. losses in accordance with the defense's position that the loss amount under the guidelines should be calculated based on those losses. In response, I stated "I don't want to do the government's job for them, but I think they have bank records that could add up to a number." Tr. at 39. For clarity, the bank records that I referenced are attached, and were entered into evidence by the prosecutors in the trial of Mark Scott as GX-723-B and GX-723-E. (Although these records were entered in evidence, and thus are likely already part of the public record, because they contain the names of possible victims of the charged crime, and because they also contain account numbers and other banking information, we respectfully request that GX-723-B and GX-723-E be filed under seal). The records show incoming wire transfers that appear to reflect the U.S.-connected OneCoin membership purchases (i.e. the money comes from U.S. and non-U.S. senders and is directed to a U.S. bank account of a U.S. entity called SecurePoint). The transfers reflected in GX-723-B provide a readily-available total U.S. transfer amount of approximately \$10.2 million. GX 723-E notes that many of the transfers reflected on GX-723-B were for "educational packages."

Respectfully submitted,

A handwritten signature in blue ink that reads 'Justin S. Weddle'.

Justin S. Weddle

**GX-723-B from Mark
Scott Trial
(Filed Under Seal)**

**GX-723-E from Mark
Scott Trial
(Filed Under Seal)**